

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION**

LORINE MITCHELL

PLAINTIFF

vs.

CAUSE NO. 3:17-CV-00170-MPM-RP

STATE FARM FIRE AND CASUALTY COMPANY

DEFENDANT

**STATE FARM'S MOTION TO STRIKE
THE DECLARATION OF T. JOSEPH SNODGRASS**

Pursuant to L.U.Civ.R. 7, Fed. R. Civ. P. Rule 16(f), and Fed. R. Evid. 802, Defendant State Farm Fire and Casualty Company ("State Farm") respectfully moves the Court to strike the Declaration of T. Joseph Snodgrass in Support of Plaintiff's Motion for Class Certification [115-7] because it contains inadmissible hearsay and was produced long after the period allowed for discovery related to class certification. A memorandum in support of this Motion is filed separately herewith.

In addition, State Farm respectfully submits the following documents as Exhibits to its Motion:

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| EXHIBIT 1 | July 20, 2018 Declaration of T. Joseph Snodgrass |
| EXHIBIT 2 | State Farm's Responses to Plaintiff's First Set of Interrogatories |
| EXHIBIT 3 | January 17, 2018 Email |
| EXHIBIT 4 | State Farm's Responses to Plaintiff's Second Set of Interrogatories |
| EXHIBIT 5 | March 29, 2018 Email |
| EXHIBIT 6 | Excerpts from SFMITCHELL00050803PROD |
| EXHIBIT 7 | Plaintiff's Response to State Farm's First Set of Requests to Produce |
| EXHIBIT 8 | Plaintiff's Answers to State Farm's First Set of Interrogatories |

EXHIBIT 9	Plaintiff's Initial Disclosures
EXHIBIT 10	Plaintiff's Supplemental Initial Disclosures
EXHIBIT 11	Plaintiff's Supplemental Response to State Farm's Request for Production No. 17

Dated: August 22, 2018

Respectfully submitted,

/s/ Heidi Dalenberg

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties of record.

This 22nd day of August 2018.

/s/ Heidi Dalenberg